

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

JARROD STRINGER, *et al*,

Plaintiffs,

V.

RUTH HUGHS, IN HER OFFICIAL  
CAPACITY AS THE TEXAS SECRETARY OF  
STATE and STEVEN C. McCRAW, IN HIS  
OFFICIAL CAPACITY AS THE DIRECTOR OF  
THE TEXAS DEPARTMENT OF PUBLIC  
SAFETY

Defendants.

Civil Action No. 5:20-cv-00046-OLG

**PLAINTIFFS’ SUBMISSION OF SUPPLEMENTAL INFORMATION IN  
SUPPORT OF ORIGINAL EMERGENCY APPLICATION FOR  
PRELIMINARY INJUNCTION**

Plaintiffs have pending before this Court a request for preliminary injunction, for which relief was previously partially granted and partially abated. Plaintiffs' Emergency Application for Preliminary Injunction, Doc. 5 (Jan. 17, 2020); Plaintiffs' Supplementary Brief in Support of Preliminary Injunction, Doc. 69 (May 13, 2020); Order, Doc. 46 (Jan. 30, 2020). One issue relevant to the current proceeding is the imminence of injury to Plaintiff Stringer both for the purposes of establishing standing and to demonstrate irreparable injury to warrant a preliminary injunction. Accordingly, Plaintiffs respectfully submit the attached Declaration of Plaintiff Jarrod Stringer and his accompanying notice of non-renewal of lease which he submitted to his landlord on June 18, 2020. Exhibit A. Mr. Stringer has previously testified as to his intent to move on or before the end of his current lease, which expires on August 24, 2020. *See* Excerpts of Apr. 29 Deposition of Jarrod Stringer at 35:6–36:24, Doc. 69-1 at 72-73. The attached notice of non-renewal further

demonstrates that Mr. Stringer has concrete and imminent plans to move, and that he will once again be in a position to update his driver's license address online in the near future. Mr. Stringer has also testified that he will once again update his driver's license address online when he is in the position to do so, and, if able, will simultaneously update his voter registration information. *See id.* at 36:25-37:15, Doc. 69-1 at 73-74. These actions would be consistent with his past conduct, and all the more necessary due to the infeasibility of in-person transactions due to the COVID-19 pandemic.

As this Court is aware, Mr. Stringer has previously been injured on two separate occasions by Defendants' refusal to offer simultaneous voter registration application opportunities with online driver's license transactions and has been forced into litigation to vindicate his rights. If there is not a system in place for individuals to simultaneously apply to register to vote while conducting driver's license transactions online, in compliance with the mandates of the National Voter Registration Act, Mr. Stringer will have his legal rights violated for a third time. Additionally, the organizational and associational Plaintiffs in this case continue to experience daily irreparable injury as a result of Defendants' legal violations. Defendants have consistently indicated that they still believe substantial time may be required to completely finalize the remaining technological steps necessary to provide a simultaneous voter registration application experience. *See* Defendants' Supplemental Brief in Opposition to Plaintiffs' and Plaintiff-Intervenors' Request for Preliminary Injunction at 12-13, Doc. 74 (May 22, 2020). Therefore, Plaintiffs offer this additional information to support the standing and irreparable injury faced by Mr. Stringer, and respectfully urge consideration of their request for a preliminary injunction with relief granted as soon as practicable and in any event with sufficient time such that Plaintiff Stringer will be fully able to exercise his legal right to simultaneously change his voter registration

address while updating his driver's license address online when he moves on or before August 24, 2020.

Dated: June 29, 2020

Respectfully submitted,

/s/ Mimi Marziani

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record on June 29, 2020 via the Court's CM/ECF system.

/s/ Mimi Marziani

Ex. A

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JARROD STRINGER, NAYELI GOMEZ,  
JOHN HARMS, MOVE TEXAS CIVIC FUND,  
and LEAGUE OF WOMEN VOTERS OF TEXAS

Plaintiffs,

v.

RUTH HUGHS, IN HER OFFICIAL  
CAPACITY AS THE TEXAS SECRETARY OF  
STATE and STEVEN C. McCRAW, IN HIS  
OFFICIAL CAPACITY AS THE DIRECTOR OF  
THE TEXAS DEPARTMENT OF PUBLIC  
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**DECLARATION OF JARROD STRINGER**

My name is Jarrod Stringer. I am over the age of 18 and capable of making this declaration. The facts stated herein are within my personal knowledge.

1. Attached hereto is a true and correct copy of the 60-day notice to move out and non-renewal of lease submitted by me and my wife, Trang Pham, to our landlord on June 18, 2020.

This Declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, State of Texas, on 23<sup>rd</sup> day of June, 2020.

Jarrod Stringer



June 18, 2020

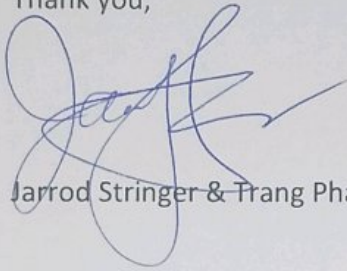
Jarrold Stringer & Trang Pham  
2401 Lazy Hollow Dr. Apt 130A  
Houston, Texas 77063

Village at Piney Point  
2601 Lazy Hollow Dr.  
Houston, Texas 77063

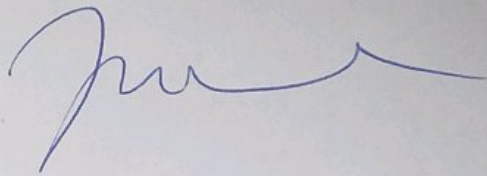
Dear Management,

We are writing you today to submit our 60 days moveout notice. Our lease expires on August 24, 2020, and we will not be renewing it.

Thank you,

A handwritten signature in blue ink, appearing to be "Jarrod Stringer", with a large loop at the end.

Jarrold Stringer & Trang Pham

A handwritten signature in blue ink, appearing to be "Trang Pham", with a long horizontal stroke at the end.